

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION**

<b>IN RE GENESIS MARINE, LLC, AS</b>	§	
<b>OWNER OF THE TOWING VESSEL</b>	§	<b>Civil Action No.</b> <u>4:21-cv-2679</u>
<b>GENESIS PATRIOT, FOR</b>	§	
<b>EXONERATION FROM OR</b>	§	<b>Admiralty – Rule 9(h)</b>
<b>LIMITATION OF LIABILITY</b>	§	

**AD INTERIM STIPULATION**

Petitioner Genesis Marine, LLC (“Genesis”), as owner, of the vessel *GENESIS PATRIOT*, its engines, equipment, gear, tackle, etc. (the “Vessel”), instituted a proceeding in this Court for exoneration from or limitation of liability on account of certain potential claims for injury, loss, cost, expense, damage, or destruction occasioned by or resulting from the Vessel’s voyage commencing and ending on or about February 21, 2021. Petitioner prays that a notice be issued to all persons claiming damages for injury or arising out of the voyage, citing them to appear and prove their respective claims, and that an injunction issue restraining the prosecution of any and all other proceedings.

Petitioner wishes to provide an *Ad Interim* Stipulation for Value as security for the benefit of claimants, pending any appraisalment of the value of Petitioner’s interest in the Vessel as the Court may order.

Petitioner anticipates the possibility that claims may be forthcoming that arise out of the above-described voyage.

Petitioner wishes to prevent the commencement or continued prosecution of any and all suits, actions, or legal proceedings of any nature in any and all courts, except in this proceeding, with respect to the above-described voyage, and also wish to provide an *Ad Interim* Stipulation for

Value as security for the claimants, pending appraisal, if any, of the amount of Petitioner's interest in the Vessel.

Petitioner therefore stipulates the sum of FIVE MILLION SIX HUNDRED SEVENTY THOUSAND U.S. DOLLARS (\$5,670,000.00) with interest at six percent per annum from the date hereof, and costs, as the maximum value of Petitioner's interest in the Vessel at the end of the Vessel's voyage, or will otherwise comply with the Court's order as provided by Supplemental Rule F for Certain Admiralty and Maritime Claims & Asset Forfeiture Actions of the Federal Rules of Civil Procedure, pending which this Stipulation will stand as security for all claims in this limitation proceeding.

Respectfully submitted,

/s/ Justin C. Warner

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